

This email is submitted in opposition to the proposed case closure for the Handy Stop underground storage tank site located at 25 North Weed Boulevard, Weed, CA (North Coast Regional Water Board Case No. 1TSI048). In review of the July 3, 2015, "UST Case Closure Review Summary Report", there are several corrections that need to be pointed out. In addition, a substantial reason for opposing closure of the site at this time is due to the following:

-Verification groundwater monitoring is required. Corrective action was implemented at the site in August 2014 via in-situ chemical oxidation under General Waste Discharge Requirements Order No. R1-2006-0107 (Order R1-2006-0107) issued by the Executive Officer on November 27, 2013. As required in the provisions of Order R1-2006-0107 a monitoring plan was submitted to monitor the effectiveness of the treatment system. However, post-injection monitoring has not been conducted to the satisfaction of our office. This information is not referenced in the UST Summary Report.

In regards to the information presented in the UST Summary Report, Regional Board staff provide the following comments:

-The UST Summary Report states that "This case meets all of the required criteria of the Policy." Later, a statement is made that "Boles Creek is located approximately 75 feet north of the plume boundary." Then under the "Rational for Closure under the Policy" header, it states that the nearest "surface water body is greater than 250 feet from the defined plume boundary." Regional Board staff find that the distance to Boles Creek is immediately adjacent to the site, and within 75 feet of the defined plume boundary. Therefore, it does not meet all the required criteria of the Policy, and more specifically does not meet the Groundwater Specific Criteria.

-The UST Summary Report states "active remediation has not been conducted at the site for the last 18 years." This is an inaccurate statement. As previously mentioned, in-situ chemical oxidation was conducted in August 2014. And as a prelude, the site has gone through Bench-Scale and Pilot-Scale Testing. A Corrective Action Plan was implemented, and General WDRs issued for the CAP require confirmation monitoring. This work was conducted in the last five years.

-The UST Summary Report states that "the affected shallow groundwater is currently being used as a source of drinking water." This statement is not consistent with the scope of the low threat policy. It also appears to be inaccurate regarding the local use of groundwater and is perhaps an error in the document as it conflicts with other statements. This item would need further clarification prior to closing the case.

-The UST Summary Report states that “remaining petroleum hydrocarbon constituents are limited and stable, and concentrations are decreasing.” This statement appears to include the findings of recent groundwater monitoring events in which some monitoring wells had contamination effectively destroyed during injection of the chemical oxidant. However, further groundwater monitoring is needed to assess the true impact on the subsurface formation. Follow through with the confirmation groundwater monitoring is required by Order R1-2006-0107.

Thank you for the opportunity to provide comment on the proposed UST case closure. In summary, North Coast Regional Water Board staff does not concur with case closure at this time.

Sincerely,

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